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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIXIE D. PRINCE, an individual;

Plaintiff,

v.

DILLARD'S INC.; DOE MAINTENANCE
WORKER; and DOES I through X, inclusive;
and ROE CORPORATIONS I through V,
inclusive;

Defendants.

Case No.: 2:24-cv-01750-GMN-DJA

**STIPULATION AND PROPOSED
ORDER TO REMAND, ALLOW
PLAINTIFF TO DISMISS DILLARD'S
INC., AND FILE AN AMENDED
COMPLAINT NAMING THE
CORRECT DEFENDANT**

(First Request)

IT IS HEREBY STIPULATED by, Plaintiff, DIXIE D. PRINCE (hereinafter "Plaintiff"), and Defendant DILLARD'S INC., (hereinafter collectively the "Parties"), and their respective attorneys of record, that the Parties agree to the following:

1. The Parties stipulate and agree that this action shall be remanded to the Eighth Judicial District Court, Clark County, Nevada.

2. The Parties stipulate and agree that Plaintiff may amend her Complaint to add DILLARD INVESTMENT CO., INC., as a Defendant. Plaintiff's proposed Amended Complaint is attached hereto as **Exhibit 1**. Said Stipulation is made in accordance with FRCP 15(a)(2) and NRCP 15(a)(2).

3. The Parties stipulate and agree that the case will be recaptioned and the caption of this case will now be as follows:

...

...

DIXIE D. PRINCE, an individual;

Plaintiff,

vs.

DILLARD INVESTMENT CO., INC., a Foreign Corporation; DOE MAINTENANCE WORKER; and DOES I through X, inclusive; and ROE CORPORATIONS I through V, inclusive;

Defendants.

4. The Parties expressly acknowledge that as of the filing of this Stipulation, no new parties have answered or otherwise appeared in this matter besides Plaintiff and the above-named Defendants.

5. The Parties stipulate and agree that DILLARD INVESTMENT CO., INC., is the proper Defendant.

6. The Parties stipulate and agree Defendant DILLARD'S INC., shall be dismissed, without prejudice, from this matter and removed from Plaintiff's proposed Amended Complaint attached hereto as **Exhibit 1**.

7. Counsel to this matter have agreed to the use of their e-signatures via email correspondence, attached hereto as **Exhibit 2**.

DATED this 21st day of October, 2024.
ATKINSON WATKINS & HOFFMANN,
LLP

/s/ John F. Bemis, Esq.

JOHN F. BEMIS, ESQ.
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DATED this 21st day of October, 2024.
HALL & EVANS, LLC

/s/ Omar Nagy, Esq.

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Attorneys for Defendant Dillard's, Inc.

ORDER

It is hereby ordered that the case shall be remanded to the Eighth Judicial District Court, Clark County, Nevada. The Parties shall present the remaining stipulations to the presiding state court judge as this Court no longer has jurisdiction over the case.

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE

DATED: October 22, 2024